

Adversary Fees – Default Judgment

		Case 19-03072	Doc 39-1	Filed 05/14/20	Entered 05/14/20	14:24:02	Desc
8-28-19	Review adversary action, letter to Del on service and when we can get judgment.	PVS .40	134.00	Exhibit(s)	Page 1 of 4		
8-30-19	Conference with Paul Sween and Adam Houck regarding bankruptcy motion and memo.	MEC .40	90.00				
8-30-19	Office conference with Paul Sween, review Motion filings.	AJH .75	180.00				
9-6-19	Letter to Corry & Associates, Robert J. Corry, Jr. and attorney Harvey Steinberg mailing adversary bankruptcy court notice. Prepare Certificate of Service. File Certificate of Service for Adversary case on the bankruptcy court website. Emails from bankruptcy court. Email to Paul Sween. Copy email to Delvin Drinkall. Organize file.	DGS 1.50	210.00				
9-12-19	Interoffice conference on default judgment and where we go from here, discuss past judgment remedies, letter to Chris at John Davis Credit, letter to Jeff on Ag Direct.	PVS 1.00	335.00				
9-12-19	Office conference with Paul Sween, review adversarial file for default judgment.	AJH 1.00	240.00				
9-14-19	Research procedure for obtaining default judgment.	AJH 1.50	360.00				
9-18-19	Office conference with Paul Sween. Email received from bankruptcy court regarding adversary case. Office conference with Adam Houck regarding filing documents in adversary case.	DGS .75	105.00				
9-18-19	Office conference with Paul Sween. Email to and from Kristen at the bankruptcy court. Letters to all interested parties mailing copy of Amended Notice of Hearing. Prepare Certificate of Service. File Amended Notice of Hearing and Certificate of Service on bankruptcy court website. Email from bankruptcy court - filed documents. (no charge)	DGS 1.35	.00				
9-18-19	Complete drafts of default judgment documents, prepare for filing.	AJH 3.00	720.00				
9-19-19	Office conference with Adam Houck. Make copies of documents to be served on Corry & Associates and Robert J. Corry. Letter to Corry & Associates and Robert J. Corry. Prepare documents to be filed in adversary bankruptcy case. Telephone call to bankruptcy court - left message for Kristen. Telephone calls from Kristen at bankruptcy court. Prepare Affidavit Requesting Clerk's Entry of Default. Office conference with Adam Houck. File Affidavit Requesting Clerk's Entry of Default on bankruptcy court website.	DGS 1.50	210.00				
9-19-19	Office conference with Daren Steele-Gabel, draft updated default motion documents.	AJH 2.00	480.00				
9-20-19	Letter to Corry & Associates and Robert J. Corry, Jr. mailing default judgment documents. Prepare Certificate of Service. Prepare documents for filing. File documents on bankruptcy court website under the adversary bankruptcy case. Email received from the bankruptcy court. Scan and email Delvin Drinkall copies of the letters and default judgment documents. Copy email to						

EXHIBIT A

		Case 19-03072		Doc 39-1		Filed 05/14/20		Entered 05/14/20 14:24:02		Desc	
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	Paul Sween and Adam Houck.	DGS	1.35	189.00							
9-20-19	Complete Motion for Default Judgment, prepare for filing.	AJH	.65	156.00							
10-3-19	Call to Corry Law Office, email to Del.	PVS	.35	117.25							
10-8-19	Call from Del Drinkall on Corry situation.	PVS	.65	217.75							
10-15-19	Phone hearing on Motion for Default Judgment, put together affidavit, Findings and Conclusions and Order.	AJH	3.00	720.00							
10-15-19	Prepare for hearing, attend motion hearing by telephone, review US Code Section 542, prepare and dictate affidavit for Del Drinkall, call to Del, conference with Adam on affidavit and Findings.	PVS	2.15	720.25							
10-24-19	Gather forms necessary to collect on Federal Judgment.	AJH	1.00	240.00							
10-25-19	Complete review of requirements to collect on Federal Judgment.	AJH	.50	120.00							
11-6-19	Office conference with Attorney Adam Houck regarding adversary bankruptcy judgment. Fill out Federal Form B2650 Certification of Judgment for Registration in Another District. Scan and email to Kristin Neff, Judge Fisher's deputy clerk. Emails from and to Kristin Neff. Email received from bankruptcy court - Amended Judgment. Telephone call from Kristin Neff. Telephone call to bankruptcy court to order certified copy of the Amended Judgment. Email received from bankruptcy court - Order on interim compensation.	DGS	.75	105.00							
11-6-19	Gather materials necessary for transcribing judgment.	AJH	.90	216.00							
11-6-19	Interoffice conference with Adam on Corry, writ and discovery, email to Del.	PVS	.40	134.00							
11-8-19	Review requirements for registration of judgment, email bankruptcy clerk.	AJH	1.00	240.00							
11-12-19	Emails from bankruptcy court regarding adversary case.	DGS	.25	35.00							
11-12-19	Phone call from Kristin at Court Administration regarding transcribing judgment.	AJH	.35	84.00							
11-14-19	Review documents sent by Bankruptcy Court, draft correspondence to U.S. District of Colorado.	AJH	.50	120.00							
12-5-19	Review status of transcription of judgment, office conference with Paul Sween regarding collection.	AJH	.65	156.00							

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12-6-19	Office conference with Paul Sween and Adam Houck. Review bankruptcy file for information on wire transfers to attorney Robert Corry.	DGS	.50	70.00			
12-6-19	Conference with Paul Sween, review Corry banking information, email to Bankruptcy Court Clerk.	AJH	.90	216.00			
12-9-19	Email to Court Clerk and phone call regarding judgment.	AJH	.35	84.00			
12-17-19	Research filing Adversary Judgment against Corry in Mower County District Court. Telephone call to bankruptcy court. Telephone call to Mower County Court Administration. Office conference with Adam Houck. Prepare Affidavit of Identification of Judgment Debtor. Scan and prepare documents for e-filing in Mower County District Court. E-file Affidavit of Identification of Judgment Debtor and certified copy of the Amended Judgment on Minnesota Judicial Branch website. Emails received from Minnesota Judicial Branch.	DGS	2.35	329.00			
12-17-19	Conference with Doreen Steele-Gabel regarding transcribing judgment in Mower County; review statutes.	DKA	.35	87.50			
12-18-19	Emails received from Minnesota Judicial Branch - accepted e-filings. Email to Adam Houck and Paul Sween.	DGS	.35	49.00			
12-18-19	Begin preparation of materials for bank account garnishment.	AJH	1.50	360.00			
12-18-19	Interoffice conference on Transcript of Judgment and levy.	PVS	.45	150.75			
12-20-19	Prepare garnishment documents, ready for service.	AJH	1.50	360.00			
12-26-19	Review correspondence from District Court, draft Affidavit of Identity.	AJH	.50	142.50			
1-3-20	Emails received from Minnesota Judicial Branch - filing of Notice of Foreign Judgment and Deficiency Notice. Office conference with Adam Houck regarding Deficiency Notice - was already taken care of. Office conference with Paul Sween regarding payment to be made to Farm Credit Services. Transcribe letter to Attorney Jeffrey A. Peterson at Gray, Plant, Mooty, Mooty & Bennett - scan and email. Copy email to Paul Sween and Delvin Drinkall. Time spent organizing file.	DGS	1.35	189.00			
1-10-20	Research legal malpractice carriers, email to contact regarding coverage for Robert Corry.	AJH	1.00	285.00			
1-13-20	Interoffice conference on garnishment and matters to be done.	PVS	.35	117.25			
1-20-20	Review correspondence from Wells Fargo, office conference with Paul Sween.	AJH	.25	71.25			
1-21-20	Contact CNA regarding judgment.	AJH	.40	114.00			

1-21-20	Review responses from liability carriers.	AJH	.40	114.00
1-22-20	Review correspondence from CNA.	AJH	.15	42.75
1-27-20	Review options for post-judgment discovery.	AJH	2.00	570.00
1-28-20	Office conference with Paul Sween, draft subpoena for Wells Fargo account.	AJH	.65	185.25
1-29-20	Draft letter to Sheriff Department; prepare subpoena for service.	AJH	1.00	285.00
2-5-20	Phone call from Armando at Wells Fargo regarding subpoena.	AJH	.35	99.75
2-11-20	Email to Wells Fargo regarding subpoenaed documents.	AJH	.35	99.75
2-14-20	Review documents sent by Wells Fargo, email to Paul Sween.	AJH	.60	171.00
2-17-20	Discuss Wells Fargo matters with Paul Sween.	AJH	.35	99.75
Total				\$10,926.75